

THE TRIBAL AIR GRANTS FRAMEWORK

A MENU OF OPTIONS

**For Developing Tribal Air Grant Work Plans
And Managing Grants for Environmental Results**

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TRIBAL AIR GRANTS FRAMEWORK: A MENU OF OPTIONS for

Developing Tribal Air Grant Work Plans & Managing Grants for Environmental Results

INTRODUCTION: EPA is committed to working with tribes to develop and to implement Clean Air Act programs in Indian Country. One of EPA's primary tools in this effort is the awarding of Clean Air Act grants to help build tribal knowledge of and capacity to manage air quality issues. CAA Sections 103 and 105 allow EPA to provide grant support to tribes for this purpose. To assist tribes in writing effective grant applications and work plans, we have developed this "Tribal Air Grants Framework: A Menu of Options."

The purpose of this tool is to assist tribes seeking:

1. to apply for EPA Clean Air Act funding
2. to develop tribal knowledge and expertise
3. to manage air quality problems on reservations.

The CAA envisions an approach to air quality management that includes:

- Setting Goals to protect public health and the environment
- National Ambient Air Quality Standards
- Tribal/local specific goals to protect tribal interests
- Assessing air quality through Emissions Inventories and Monitoring
- Determining necessary reductions in pollution
- Federal Implementation Plans, or Tribal Implementation Plans
- Education programs and voluntary measures
- Implementing and enforcing control measures

Tribal air programs, like their state counterparts, may include activities that involve different elements of this framework. However, unlike the states, the tribes often do not have resources available to develop their capacity, authority, regulations, and other components needed to build and run their own CAA programs. The options in the menus include some of the more common activities involved in achieving primary air quality objectives.

It is important to recognize that these are not the **only** categories of work that EPA will fund under the CAA authorities, nor are the activities necessarily the only ones that will lead to achieving the given objectives. However, the framework is intended to provide options that can be useful to tribes in developing work plans both for assessing their air quality and in building the capacity to manage a reservation's air quality. It is also hoped that the use of this tool will help streamline the EPA review of work plans and help us to better assist tribes in managing CAA grants.

Because approvable work plans need to have (1) one or more *objectives*, (2) *activities* that support the achievement of the *objectives*, and (3) *outcomes* or *deliverables* toward the objective(s); each of the menus include examples of these mutually-supporting work plan elements. It is anticipated that through the grant negotiation process the applicant and EPA Project Officer will use and modify the elements given to fit the needs of the particular reservation or tribal community, as well as EPA priorities. However, these examples should provide a starting point for developing work plans that will effectively and efficiently address air quality issues in Indian Country – ranging from the initial assessment of air pollution sources to advanced regulatory development and implementation. This guidance is intended to serve as a reference for tribal and EPA staff during CAA grant and program development. The menus also include Nationally Reportable Outcomes or Performance Measures that will allow for accomplishments to be tracked on a national basis.

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The TRIBAL AIR GRANTS FRAMEWORK:

A Menu of Options

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MENU ITEM: *Administration and Infrastructure Development*

OBJECTIVE: Develop and maintain the requisite staff, infrastructure and administrative capacity needed to accomplish air quality activities of the current grant work plan.

ACTIVITIES / TASKS:

Note: The following tasks are options for grant applicants to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- ☐ Write job/position description for staff that will be needed to accomplish work plan tasks and objectives.
- ☐ Identify and hire appropriate personnel, either from existing tribal staff or new hire, with background and/or potential to be able to handle activities in work plan.
- ☐ Arrange for office space and equipment sufficient to accomplish the work plan activities.
- ☐ Set up a record keeping system for grant and air related activities, including tracking of grant terms and conditions, fiscal data, equipment, timekeeping records, work plan performance, milestones, and deliverables.
- ☐ Identify training needs of staff and write a training plan; make necessary arrangements for registration and attending the appropriate classes.
- ☐ Attend training courses, workshops and conferences that will provide background and skills to accomplish the work plan.
- ☐ Make contacts with other tribes, state and local air professionals, through tribal, local, regional and national organizations and conferences that will provide sources of support and collaborative efforts that can help with for air quality work on the reservation, particularly surrounding jurisdictions in same or neighboring air sheds.
- ☐ Write quarterly reports, comparing activities and accomplishments with work plan milestones, timeline, and objectives, ensuring that work progresses at a rate that will allow completion of the deliverables within the project period, or if problems are encountered that may prevent that promptly notifying the grant project officer and discussing how the problems will be addressed.
- ☐ Communicate regularly with tribal grants and fiscal personnel involved with submitting the financial reports for the grant to ensure that all appropriate records are being maintained and reports, such as Reimbursement Requests and Financial Status Reports, are submitted appropriately and according to the terms of the grant.

DELIVERABLES:

- ☐ Staff hired appropriate to the job description with the capabilities to complete the work plan activities by the end of the project period, given appropriate training.
- ☐ Training plan written that supports the work plan objectives.
- ☐ The training courses, identified as necessary for the staff to develop the capacity to carry out the work plan objectives, are satisfactorily completed.
- ☐ Office management and administrative procedures established and maintained that ensure that all needed records are kept, that grant terms and conditions are satisfied, such as submission of quarterly Progress Reports and annual Financial Status Reports, and agreed outputs provided to EPA.

NATIONAL REPORTABLE OUTCOMES

- ☐ Number of tribes with staff who have received introductory level training on the Clean Air Act and basic air quality subjects.
- ☐ Number of tribes who have demonstrated successful grant management and air project management capabilities through the timely compliance with all grant terms and conditions and completion of work plan deliverables. [Or other indicator of the capacity demonstrated for successful environmental grant management for achieving the goals of the Clean Air Act in Indian Country.]

MENU ITEM: *Basic Air Quality Assessment*

OBJECTIVE: To identify the existence of and possible sources of air pollution that may be of concern to the tribe and reservation communities, identifying any need for and nature of further air quality work.

ACTIVITIES / TASKS:

Note: The following tasks are options for grant applicants to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

Conduct source inventory and categorization:

- ☐ *Training:* Obtain training related to basic air quality assessment issues.
- ☐ *Identify Stationary sources* through such activities as:
 - ▶ *Phone book review* of businesses operating on the reservation.
 - ▶ “*Windshield survey*” of businesses operating and activities on the reservation and other reservation characteristics that influence air quality.
 - ▶ Contact neighboring jurisdictions for relevant information.
- ☐ *Area and mobile sources:* Identify the major types of area and mobile sources, such as agricultural practices, forestry burning, wood stoves, vehicle counts, unpaved roads, etc.
- ☐ *Smoke management issues:* Is there agricultural or forestry burning on or near the reservation that impacts the reservation communities? Is there a smoke management program for ag or forestry burning? If so, contact managers and determine what procedures and equipment are used in the management.
- ☐ *Contact surrounding jurisdictions:* For sources off reservation that may impact air quality on the reservation. [Are there common air quality issues that should be addressed with any of the surrounding jurisdictions?]

Track and evaluate air quality complaints:

- ☐ *Research past history of air quality complaints:* Contact relevant tribal and local offices (e.g.environmental or resource management, public health, hospitals, neighboring state/local/tribal air quality offices) that may have received complaints about air quality problems. Identify how many over what period of time, time of year, possible causes that may be generating the problem.
- ☐ *Establish a system for tracking air quality complaints* that will provide ongoing information on the type and severity of air quality problems of greatest concern to the residents of the reservation.
- ☐ *Indoor Air Quality:* Contact housing, health and other relevant tribal departments to document whether there has been a history of complaints associated with indoor air. Contact EPA Regional IAQ for information on available assistance for such complaints and training that may be available.

Evaluate Monitoring Needs:

- ☐ *Existing or past monitoring:* Determine whether there has been or is currently any air quality monitoring conducted on the reservation, its type and what the data collected has shown about air quality.
- ☐ *Off reservation monitoring:* Identify any off reservation air quality or meteorological data monitoring that may be collecting useful information for the reservation and arrange to meet with the responsible agency to learn and establish an information sharing agreement, as appropriate.

DELIVERABLES:

- ☐ Report identifying: number and type of businesses, their locations, potential air pollution produced, and the significant characteristics of the reservation that should be considered in evaluating air pollution issues. Report should include a map, if possible, with significant sources, population centers, and relevant reservation characteristics annotated.
- ☐ Identify need for additional air quality activities such as a smoke management plan for agricultural or forestry burning, regulatory development, education and outreach, indoor air quality assessments, or other targeted projects.
- ☐ Report of history and nature of air quality related complaints identified through tribal agencies and other contacts.
- ☐ Summary of what has been learned about indoor air-related complaints on the reservation, including number, type, and possible causes.
- ☐ Written evaluation of additional data that would assist in more completely evaluating air quality problems, such as emission inventory or monitoring, including the type and how such additional data would be used to inform air quality management decisions.

NATIONAL REPORTABLE OUTCOMES:

- ☐ Number of tribes who have completed a basic evaluation of all sources of air pollution on the reservation supported by a report summarizing these and identifying what the tribe considers to be the major sources of concern, if any.
- ☐ Number of reservations for which an air quality assessment has been completed.
- ☐ Number of tribes that have assessed existence and nature IAQ problems.
- ☐ Number of tribes with staff having received training on air quality assessment.

MENU ITEM: *Participation in Regional & National Policy Groups*

OBJECTIVE: To actively participate in appropriate policy groups working on air quality issues, by attending meetings and contributing to group objectives.

ACTIVITIES / TASKS:

Note: The following tasks are options for grant applicants to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- ☐ Participate in Regional Planning Organizations (RPOs), national tribal organizations/forums/workgroups, or other tribal, local, state, regional or national/EPA organizations, such as: National Tribal Air Association, EPA's 8 Hour Ozone Designations Workgroup, RTOCs, or NTOCs, the TAMS Steering Committee, etc.
- ☐ Select a particular work group of an air related organization that tribal professional can join and commit to actively become involved. Commit to a specific amount of time that will be devoted to this participation or percentage of work under the grant.
- ☐ Periodic reports on contributions made to the group and information and issues addressed in the group to EPA and the tribal council and community, as a means of building tribal capacity to understand broader air quality issues and participate in policy development.

DELIVERABLES:

- ☐ Report of meetings attended and subjects addressed at each, as well as how this information was then communicated to the tribal government and/or community, including at council meetings, powwows, schools, or similar events.
- ☐ Quarterly and final grant reports would include documentation of participation, including details of participation in the various groups, the nature of participation, decisions or policy developed through participation and noteworthy contributions.

NATIONAL REPORTABLE OUTCOMES:

- ☐ Number of tribes, and tribal professionals actively participating in national/regional air organizations and air policy work groups that are impacting how air quality issues are being addressed.
- ☐ Record of noteworthy contributions to policy development by tribal professionals.

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MENU ITEM: *Emissions Inventory*

OBJECTIVE: To prepare an emissions inventory for a geographic area within the boundaries of or affecting a tribal reservation or community.

ACTIVITIES / TASKS:

Note: The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- ☐ Obtain emission inventory development training.
- ☐ Conduct a source inventory [Review and describe on-reservation pollution sources. Identify applicable CAA requirements, if any. Write a report documenting sources identified.]
- ☐ Conduct a source categorization.
- ☐ Prepare Inventory Preparation Plan (describing what inventory will cover and how it will be developed) for EPA review.
- ☐ Conduct emissions inventory according to EPA-reviewed Inventory Preparation Plan
- ☐ Prepare draft emissions inventory report for EPA review.
- ☐ Prepare final emissions inventory report.
- ☐ Evaluate the significance of the sources and emissions, including implications for monitoring or regulatory program, noticing significance of and possibly a comparison to any nearby attainment/nonattainment areas.
- ☐ Submit inventory data to National Emissions Inventory database.

DELIVERABLES:

- ☐ Source inventory report
- ☐ Inventory Preparation Plan.
- ☐ Draft emissions inventory report.
- ☐ Final emissions inventory.
- ☐ Submission of inventory data to National Emission Inventory database.

NATIONAL REPORTABLE OUTCOMES:

- ☐ Number of Tribes that have completed basic source inventory.
- ☐ Number of Reservations for which emissions inventories have been submitted to the National Emission Inventory database.

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MENU ITEM: *Indoor Air Quality Assessment and Training*

OBJECTIVE: To assess the extent of indoor air pollution in tribal buildings and respond to complaints, to evaluate the potential relation of adverse health impacts to poor IAQ, and to provide training for professionals and members of the public on IAQ issues.

ACTIVITIES / TASKS:

Note: The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- ☐ Obtain assistance and/or training on conducting IAQ assessments and community outreach.
- ☐ Conduct basic investigations of tribal homes and buildings; conduct walkthrough inspections that are primarily observational looking for pollutant sources, water and moisture problems, ventilation, hygiene, biocontaminants, and observations about temperature and humidity, etc. Checklists may be beneficial to this effort. A Quality Assurance Plan may be required, depending on the extent of any monitoring pursued. Quality Assurance plan may be required, depending on the extent of monitoring.
- ☐ Gather information about health issues related to IAQ in tribal buildings or housing.
- ☐ Provide extensive indoor air training for facilities, health, and environmental staff, including common pollutants, health effects, prevention, assessment, and clean up.
- ☐ Provide training to building inhabitants/members of the public on IAQ issues, including common pollutants, health effects, prevention, assessment, and clean up. Focus on what a building occupant can do to prevent IAQ problems.

Note: *Remediation* work that may be needed to resolve IAQ problems is typically not a fundable activity under CAA grants. However, plans for how remediation will be accomplished should be considered in developing an indoor air quality program. Many needed changes can be accomplished easily by the building owner. Also, there may be other funding sources available to implement more major renovations required.

DELIVERABLES :

- ☐ Report the number of homes assessed for IAQ pollutants and concerns, including a summary of all data and issues identified.
- ☐ Summary of health issues related to IAQ in tribal buildings.
- ☐ Report number of trainings or workshops held for professionals and members of the public, including number of attendees. Include a course evaluation and a summary of evaluation results.
- ☐ Report on any available data that indicates an improvement in indoor air quality, health outcomes, behavior changes as a result of grant work.

NATIONAL REPORTABLE OUTCOMES:

- ☐ Number of tribes who have conducted IAQ assessments/training and reported results, including statistics such as number of individuals reached, homes and/or tribal buildings assessed and subsequently remediated.

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MENU ITEM: *Air Quality Monitoring Activities*

OBJECTIVE: To identify through collection of quality assured monitoring data the nature and level of air pollution on a reservation or in a tribal community over a particular period of time.

ACTIVITIES / TASKS:

Note: The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- ☐ *Need and Type of Monitoring Data Identification:* Identify most appropriate type of monitoring data to collect: Learn what other monitoring is being conducted by surrounding jurisdictions and what the data shows. Through information from basic air quality assessment activities, evaluate the possible options for additional air quality data that could assist the tribe in managing its air quality or assisting other jurisdictions in managing air quality.
 - ▶ Mini-vol or high-vol PM monitors are best for initial PM monitoring
 - ▶ PM 10 or 2.5: either continuous or filter-based FRMs
 - ▶ Meteorological data needs
 - ▶ Other criteria pollutants or HAPs
- ☐ *Training:* Obtain training on topics related to QAPPs and appropriate monitoring.
- ☐ *QAPP and Siting:* Prepare a QAPP for the type of monitoring determined with EPA assistance that will provide air quality data useful to the tribe, the air shed, or region. QAPP will provide basis for siting the monitor(s) and procedures to be followed to ensure quality of data collected.
- ☐ *Saturation Study:* Conduct a saturation study with mini-vol monitors to determine the existence and location of zones of elevated air pollution.
- ☐ *FRM PM Monitor:* Based upon the Quality Assurance Project Plan (QAPP) and EPA-approved siting, install and operate the filter-based monitor for appropriate period of time. As data is collected, provide written analysis of what the data indicates about air pollution levels.
- ☐ *Continuous Monitoring for PM:* Based upon types of sources identified on the reservation, continuous monitoring may be used to provide ongoing information about sources that produce peaks in air pollution, such as agricultural burning or forestry burning. Data can be provided on a real time basis to reservation communities for decisions about residential burning, or health concerns. Linking to a tribal web page is an optional way of disseminating the data.
- ☐ *Meteorological Stations:* When appropriate and based on an EPA-approved QAPP, install and operate a met station in conjunction with monitoring equipment to provide additional information about the sources of air pollution or to help assist in forestry or agriculture smoke management plans.
- ☐ *Other Monitoring:* When appropriate conduct other criteria pollutant or HAPS monitoring subject to EPA-approved QAPP.

☐ *Provide AQ Data to EPA:* As appropriate, the quality assured data should be uploaded into the EPA AQS system or provided to EPA in other applicable format.

☐ *Baseline Data:* Once a baseline is established for the air pollution levels, assess need for ongoing monitoring in a written report.

☐ *Interim Reports of Air Quality Data:* Provide EPA and Tribe information on what levels of air pollution that monitors show on regular basis.

DELIVERABLES:

☐ Quality assured data provided to EPA and, as appropriate, uploaded into the AQS database.

☐ A report analyzing the air quality data for EPA and the Tribe, providing information such as how the data compares to NAAQS limits, identification of the impacts of particular sources on or off the reservation.

NATIONAL REPORTABLE OUTCOMES:

☐ Percentage of reservations (or communities in Indian Country) with potential air quality problems that have been assessed or monitored.

☐ Number of tribes operating particular types of monitors on their reservations where potentially impacted by the pollutant and providing the data to AQS.

☐ Reports on how tribes have used assessment or monitoring data to better manage their air quality.

☐ Percentage of reservations for which air quality levels relating to particular NAAQS pollutants has been determined through monitoring, modeling, or other assessment activities.

MENU ITEM: *Participation in Regulatory Air Quality Management*

OBJECTIVE: To participate in the management of air quality on reservations through inherent tribal authority, TAS, TIPs, delegations, and FIPs.

ACTIVITIES / TASKS:

Note: The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- ☐ Review and comment on Title V permits in same manner as citizens.
- ☐ Participate in training for Title V permit review (e.g., citizen training, Institute for Tribal Environmental Professionals).
- ☐ Enact local ordinances (e.g., burn barrel restrictions, waste dumping restrictions).
- ☐ Preparation of TAR application following TAR guidance with or without desired TAS applications.*
 - ▶ TAS for Section 105 grant authority
 - ▶ TAS for “affected state” status under Title V
 - ▶ TAS for Title V permit program
 - ▶ other CAA programs
- ☐ Preparation of TIP following TIP guidance.*
 - ▶ regulatory programs
 - ▶ source specific programs
 - ▶ area-wide limits/controls
 - ▶ mobile source issues
 - ▶ point source issues (e.g., burn barrel restrictions)
 - ▶ inspection/enforcement
 - ▶ NOx attainment strategies
 - ▶ source pre-construction permits
 - ▶ regional haze plans
- ☐ Preparation of delegation request following delegation guidance.
- ☐ Minor Source permitting program

* Gives tribal programs federal authority and backing, however tribes have the inherent authority to develop regulations in an Air Quality Management Program without federal authority and backing, if they choose.

DELIVERABLES:

- ☐ Comment letters on Title V permits.
- ☐ Local air quality ordinances enacted.
- ☐ TAR/TAS application submitted to EPA.
- ☐ TIP submitted to EPA.
- ☐ Delegation request submitted to EPA
- ☐ Measured reduction in pollution.

National Reportable Outcomes:

- ☐ Number of Tribes who have enacted local air pollution ordinances.
- ☐ Number of Tribes who have commented on Title V permits.
- ☐ Number of Tribes who have requested eligibility status under the Tribal Authority Rule (TAS).
- ☐ Number of Tribes who have been determined eligible for delegation of some CAA Section under the Tribal Authority Rule.
- ☐ Number of Tribes who have submitted a Tribal Implementation Plan (TIP).
- ☐ Number of Tribes who have been granted an approved TIP.
- ☐ Number of Tribes who have requested delegation of a Clean Air Act regulatory program.
- ☐ Number of Tribes who have been granted delegation of a Clean Air Act regulatory program.

MENU ITEM: *Local or Unique Air Quality Issues*

OBJECTIVE(s): To identify the existence of special or unique local air quality issues, their impact on human health and the environment, options for addressing the concerns identified, and, as appropriate, implementing solutions.

ACTIVITIES / TASKS:

Note: The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- ☐ Based upon an initial air quality assessment (See menu topic: “Basic Air Quality Needs Assessment”), evaluate the existence and significance of any unique air quality, through conversations with community, managers, council, adjoining air quality jurisdictions, EPA and other federal agencies, and other appropriate sources. Such unique concerns may include: open burning of solid waste, agricultural field burning, forestry prescribed burning, burn barrels, burning for land-clearing, and others.
- ☐ Network with others involved in addressing the same problem such as the RCRA program. Participate in policy groups that may exist for developing a regulatory response.
- ☐ Attend training to understand the causes and possible solutions to the problem.
- ☐ Provide education and outreach to the reservation community and tribal leadership on the issue, impact on tribe, and options for responding to the problem. Determine public and tribal position on the seriousness of the problem to the community, preferred responses, priority among other environmental and air quality concerns.
- ☐ Develop recommended approach to mitigating or monitoring the problem in the future.
- ☐ If regulatory response is an option, develop a plan for instituting a regulatory response and subsequent enforcement.
- ☐ For burning on Indian-owned land that is not on the reservation (e.g., land clearing for off-reservation casino development), evaluate the effected state’s open-burning rules and use those as a minimum guidelines for Tribal activities.

DELIVERABLES:

- ☐ Report analyzing the nature of the problem, its impact on human health and environment on the reservation, and sources of information used to identify the problem and its potential impact.
- ☐ A report on the networking conducted or policy groups and other agencies contacted, meetings attended, membership in policy groups and outcomes from such connections.
- ☐ Report on courses attended and how information gained was useful or not to understanding the problem and potential solutions.
- ☐ Report on education and outreach conducted and what was learned about the various positions held with regard to the air quality problem. This could include number of pamphlets distributed, number of speaking engagements, and changes to school environmental curricula.
- ☐ Report evaluation options for addressing the problem and any recommended option including why. This should include coordination with the Tribe's solid waste management program. Should include documentation of the report being presented to tribal leadership and their response.
- ☐ Report on any regulatory type activities, copies of regulations proposed or passed, records of enforcement, improved practices, and any evidence of mitigation of the problem.

NATIONAL REPORTABLE OUTCOMES:

- ☐ Number of tribes that have participated in addressing a particular air quality concern and the nature of participation.
- ☐ Instances where tribal effort on a local issue has made a documented impact in its being addressed, either by the tribe, or other state, local or federal agencies. For example, creation of an ongoing work group that developed a new strategy for dealing with the problem that became a model for others.
- ☐ Reduction in the number of complaints received regarding outdoor burning practices.

MENU ITEM: *Rulemaking and Enforcement*

OBJECTIVE(s): To reduce emissions of criteria pollutants or air toxics by setting and enforcing emission standards/work practice requirements for stationary, area and/or mobile sources of air pollution on tribal lands.

ACTIVITIES / TASKS:

Note: The following tasks are options for grantees to consider in developing a work plan that includes this objective. They should be modified and augmented as necessary to suit the particular needs and circumstances of the grant applicant.

- ☐ Promulgate regulations with emission standards or work practice requirements for:
 - ▶ stationary sources (e.g., reasonably available control technology or RACT standards for NO_x and VOC sources)
 - ▶ area sources (e.g., burn barrel restrictions, asbestos demolition work practice standards)
 - ▶ mobile sources (e.g., idling prohibitions, motor vehicle inspection and maintenance requirements)
- ☐ Promulgate New Source Review (NSR) permit regulations for major or minor stationary sources
- ☐ Promulgate Title V permit program regulations
- ☐ Promulgate source-specific regulations to restrict potential emissions
- ☐ Operate an air enforcement program:
 - ▶ Plan enforcement activities and target inspections/investigations
 - ▶ Conduct inspections and draft inspection reports
 - ▶ Review compliance certifications and stack test or continuous emission monitor (CEM) reports
 - ▶ Issue notices of violations (NOVs), administrative orders or administrative complaints
 - ▶ Negotiate settlements or proceed with enforcement actions

DELIVERABLES:

- ☐ Regulations promulgated
- ☐ Inspections completed
- ☐ Enforcement actions taken (e.g., number of NOVs, administrative orders or complaints)
- ☐ Number of tons/pounds removed from the air as result of promulgated regulations
- ☐ Dollars in penalties collected or dollars in environmentally beneficial supplemental enforcement projects (SEPs) completed

NATIONAL REPORTABLE OUTCOMES:

- ☐ Number of tribes who have enacted tribal air quality regulations
- ☐ Number of tribes who have EPA-approved Tribal Implementation Plans.
- ☐ Number of tribes assisting with implementation of Federal Implementation Plans or other regulations.
- ☐ Number of tribal air quality enforcement actions taken.
- ☐ Number of tons/pounds removed from the air as result of tribal regulations
- ☐ Dollars in penalties collected by tribes or in environmentally beneficial SEPs completed